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March 19, 2020

Via ECF

The Honorable Judge Analisa Torres
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **Chavaloc Choror v. Abitino's Pizza 49th Street Corp., et al.**
19-CV-9297 (AT)

Dear Judge Torres:

We represent the Plaintiff in the above-referenced matter and we submit this letter jointly with Defendants to respectfully request an extension of time to complete mediation and an adjournment of the Initial Conference scheduled for April 1, 2020. This is the parties' first request for an extension of time to complete mediation and the parties' first request for an adjournment of the Initial Conference.

The parties make the instant request because their original mediation date of March 18, 2020 was adjourned to April 30, 2020 due to the current health crisis and cancellation of all non-essential in-person conferences. Further, as the Initial Conference was to take place following the parties' mediation, we believe that it would be in the best interests of the parties and the Court to adjourn the conference to a date following the parties' April 30, 2020 mediation. In the event that the Initial Conference remains scheduled for April 1, 2020, the parties would respectfully ask that it be converted to a telephonic conference in light of the aforementioned health concerns.

This request does not affect any other scheduled dates or deadlines at this time. The parties have worked in good faith to comply with all discovery orders to date and are hopeful a resolution will be reached at the April 30, 2020 mediation.

We thank Your Honor for her consideration on this matter and remain available to provide any additional information.



**HELEN F. DALTON & ASSOCIATES,
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Respectfully submitted,

/s/
Roman Avshalumov, Esq.

GRANTED. The initial pretrial conference scheduled for April 1, 2020 is ADJOURNED to **May 14, 2020, at 11:00 a.m.** The initial pretrial conference will be conducted telephonically. The parties are directed to call (888) 398-2342 (if that number is busy, the parties can try (215) 861-0674), access code 5598827.

By **May 7, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: March 20, 2020
New York, New York

A handwritten signature in black ink, appearing to read 'Analisa Torres'.

ANALISA TORRES
United States District Judge